



City of Chicago  
Harold Washington, Mayor

Board of Ethics  
Harriet McCullough  
Executive Director

August 31, 1987



Case Number 87022.D

CONFIDENTIAL

Dear 

On July 14, 1987, the Board of Ethics received your letter dated May 11, 1987. In this letter, you stated that the Columbia Yacht Club offers complimentary memberships to individuals for service to the boating community and the City of Chicago. You also informed the Board that as complimentary members, individuals have access to club facilities such as the dining room and bar. It is the understanding of the Board that the public can obtain access to the club's dining room and bar by purchasing an associate membership which costs \$710 for the first year. If this is true, the Board must conclude that complimentary memberships are also worth approximately \$710.


As previously stated in our letter of May 5, 1987, Section 26.2-4(b) of the Governmental Ethics Ordinance prohibits persons from giving or offering to give anything of value to City officials or employees if such gifts are "based upon any mutual understanding, either explicit or implicit, that the votes, official actions, decisions or judgments of the official or employee would be influenced thereby." Although no evidence exists which would confirm the existence of a quid pro quo agreement between public officials who accept your offer for a complimentary membership and the Columbia Yacht Club, it is the opinion of the Board that such an agreement may be implied by the public. As a result of this risk of the appearance of impropriety, we recommend that you refrain from offering complimentary memberships to public officials who are in a position to make decisions regarding your interests in City business.



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Please note that regardless of whether you choose to adopt our recommendation we are obligated to inform City officials and employees that if they accept complimentary memberships which have a value of \$500 or more from any club: (1) they must report acceptance of this gift on their annual Statement of Financial Interests; and (2) they must abstain from participating in the making of a governmental decision with respect to any matters which involve such a club.

Sincerely,

  
Sol Brandzel  
Chairman

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